

FILED

NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUN 10 2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

JOHN RACASI II

Case No. 19 CR 960

Violations: Title 18, United States
Code, Sections 922(a)(1)(A) and
922(a)(5)

COUNT ONE

JUDGE LEINENWEBER

MAGISTRATE JUDGE KIM

The SPECIAL JANUARY 2019 GRAND JURY charges:

Beginning no later than in or around July 3, 2017, and continuing until on or about December 23, 2019, at Chicago, in the Northern District of Illinois, and elsewhere,

JOHN RACASI II,

defendant herein, not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms;

In violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT TWO

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about December 19, 2019, at Hodgkins, Illinois, in the Northern District of Illinois, Eastern Division,

JOHN RACASI II,

defendant herein, residing in Alabama and not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transport and deliver in the State of Illinois a firearm, namely, a Anderson Manufacturing, AM-15, multi-caliber pistol, bearing serial number 15219700, and a Smith & Wesson, Model M&P 15, .223 caliber pistol bearing serial number SU65022, to a person who he knew or had reasonable cause to believe did not reside in Alabama;

In violation of Title 18, United States Code, Section 922(a)(5).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(a)(1)(A), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to: (a) a Mossberg, model 500A, 12-gauge shotgun bearing serial number P251663; (b) a Mossberg, model 500A, 12-gauge shotgun bearing serial number L672729; (c) a Mossberg, model 500AB, 12-gauge shotgun bearing serial number G824841; (d) a Mossberg, model 500A, 12-gauge shotgun bearing serial number P471231; (e) a Mossberg, model 500AB, 12-gauge shotgun bearing serial number MV27363M; and (f) a Mossberg, model 500A, 12-gauge shotgun bearing serial number L253366; and all associated ammunition.

TRUE BILL

FOREPERSON

UNITED STATES ATTORNEY